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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and
JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINES FOR
BRIEFING ON MOTION TO
UNSEAL**

(SECOND REQUEST)

Pursuant to Local Rule IA 6-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services (“Plaintiffs”) and Defendant Bank of America, N.A. (“BANA” and together with Plaintiffs the “Parties” and each a “Party”), through their counsel of record hereby stipulate to a modest

1 extension of existing briefing deadlines in connection with Plaintiffs' Motion to Unseal Court
2 Documents (ECF No. 52) filed on June 4, 2020 ("Motion to Unseal"). The Parties respectfully
3 request the Court enter this Stipulation as an Order. In support of this request, the Parties
4 represent as follows.

5 Plaintiffs' motions raise a number of complex issues of fact and law. The Parties agree
6 that there is good cause for the modest extension of the briefing schedule requested herein in
7 order to allow them further time to analyze these issues and prepare an appropriate response or
8 papers in further support. In addition, the ongoing effects of the COVID-19 pandemic continue to
9 affect the ability of the parties and their counsel to respond to the motions at issue. In particular,
10 the BANA employees with the knowledge of the relevant facts continue to operate from a remote
11 environment which limits ability to research the factual issues raised in the motion. Counsel faces
12 similar issues, which also pose challenges related to child care.

13 The Parties agree that the foregoing constitutes good cause to extend the deadlines as
14 requested herein. This is the Parties' second request for the extension of these deadlines. The
15 Parties recognize that a prior extension has been granted, and they have made best efforts to
16 submit the papers at issue in the time provided. However, despite those efforts, the brief
17 additional time requested herein is necessary.

18 The Parties agree that the requested extensions will not prejudice any Party. No deadline
19 for which an extension is requested herein has expired.

20 Accordingly, the Parties agree there is good cause for entry of the following new
21 deadlines:

22 1. BANA's time to file papers in response to the Motion to Unseal is extended from
23 June 25, 2020 to July 2, 2020; and

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2. Plaintiff's time to file reply papers in further support of the Motion to Unseal is extended from July 6, 2020 to July 13, 2020.

IT IS SO STIPULATED.

Dated: June 22, 2020

DATED: June 22, 2020

THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

/s/ Daniel J. Treuden (with permission)

/s/ Kiah D. Beverly-Graham

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ORDER

IT IS ORDERED that BANA's time to file papers in response to the Motion to Unseal is extended from June 25, 2020 to July 2, 2020; and

IT IS FURTHER ORDERED that Plaintiff's time to file reply papers in further support of the Motion to Unseal is extended from July 6, 2020 to July 13, 2020.



UNITED STATES MAGISTRATE JUDGE

DATED: June 23, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER EXTENDING DEADLINES FOR BRIEFING ON MOTION TO UNSEAL (SECOND REQUEST)** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: June 22, 2020

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

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